

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

INTEGRATED MEDIA RESOURCES, LLC, Individually and Derivatively on Behalf of Nominal Defendant **G2 FMV, LLC** and also Double Derivatively on Behalf of Nominal Defendant **G2 INVESTMENT GROUP, LLC.** § CIVIL CASE NO. 1:21-CV-04993
Plaintiffs, §
v. §
JONATHAN TODD MORLEY, DORI V. KARJIAN, DAVID SAMS, JONATHAN LERMAN, ANTONIO DE LA RUA, MARIA BOYAZNY, §
Defendants, §
and §
G2 FMV, LLC, and G2 INVESTMENT GROUP, LLC. §
Nominal Defendants. §

VERIFIED ANSWER

I. NATURE OF THE ACTION.

1. ANSWER: The allegations set forth in Paragraph 1 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Plaintiff Defendant Karjian (i) denies the allegations against him set forth in Paragraph 1 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 1 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

2. ANSWER: The allegations set forth in Paragraph 2 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 2 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 2 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

3. ANSWER: The allegations set forth in Paragraph 3 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 3 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 3 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

4. ANSWER: Pro Se Defendant Karjian denies the allegations against him set forth in Paragraph 4 of the Complaint and lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 4 of the Complaint.

5. ANSWER: Pro Se Defendant Karjian denies the allegations against him set forth in Paragraph 5 of the Complaint and lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 5 of the Complaint.

6. ANSWER: Pro Se Defendant Karjian denies the allegations against him set forth in Paragraph 6 of the Complaint. Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 6 of the Complaint, except admits, upon information and belief, the allegations that the Management Committee of G2 FMV and the Executive Committee was controlled by Morley.

7. ANSWER: The allegations set forth in Paragraph 7 of the Complaint constitute statements

and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 7 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 7 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

8. ANSWER: Pro Se Defendant Karjian denies the allegations against him set forth in Paragraph 8 of the Complaint and lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 8 of the Complaint.

II. JURISDICTION AND VENUE.

9. ANSWER: The jurisdictional allegations in Paragraph 9 of the Complaint state legal conclusions to which no answer is required. To the extent an answer is required, Pro Se Defendant Karjian denies the allegations against him set forth in Paragraph 9 of the Complaint and lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 9 of the Complaint.

10. ANSWER: The venue allegations in Paragraph 10 of the Complaint state legal conclusions to which no answer is required. To the extent an answer is required, Pro Se Defendant Karjian denies the allegations against him set forth in Paragraph 10 of the Complaint and lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 10 of the Complaint.

11. ANSWER: The venue allegations in Paragraph 11 of the Complaint state legal conclusions to which no answer is required. To the extent an answer is required, Pro Se Defendant Karjian denies the allegations against him set forth in Paragraph 11 of the Complaint and lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 11 of the Complaint.

III. PARTIES.

12. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 12 of the Complaint.

13. ANSWER: Pro Se Defendant Karjian admits that Nominal Defendant G2 FMV, LLC is a limited liability company organized under the laws of Delaware and lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 13 of the Complaint.

14. ANSWER: Pro Se Defendant Karjian admits that Nominal Defendant G2 Investment Group, LLC is a limited liability company organized under the laws of Delaware and lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 14 of the Complaint.

15. ANSWER: Except as further answered below, upon information and belief, Pro Se Defendant Karjian admits the allegations set forth in Paragraph 15 of the Complaint. Pro Se Defendant Karjian denies that Morley is a co-conspirator of Pro Se Defendant Karjian and lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegation that Morley is a co-conspirator of the remaining Defendants.

16. ANSWER: Pro Se Defendant Karjian lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 16 of the Complaint, except that he admits that, upon information and belief, de la Rua is a Co-Founder of G2 IG and has been a member of the Management Committee of G2 FMV and the Executive Committee of G2 IG.

17. ANSWER: Pro Se Defendant Karjian lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 17 of the Complaint.

18. ANSWER: Pro Se Defendant Karjian admits he is an individual residing in the state of Washington. Pro Se Defendant Karjian denies the remaining allegations in Paragraph 18.

19. ANSWER: Pro Se Defendant Karjian lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 19 of the Complaint.

20. ANSWER: Pro Se Defendant Karjian lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 20 of the Complaint.

21. ANSWER: Pro Se Defendant Karjian repeats and realleges as if fully set forth herein its responses to the allegations in Paragraphs 1 to 20 of the Complaint.

IV. DUTIES OF THE INSIDER DEFENDANTS.

22. ANSWER: The allegations set forth in Paragraph 22 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 22 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 22 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

23. ANSWER: The allegations set forth in Paragraph 23 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 23 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 23 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

24. ANSWER: Pro Se Defendant Karjian denies the allegations against him set forth in Paragraph 24 of the Complaint and lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 24 of the Complaint.

25. ANSWER: The allegations set forth in Paragraph 25 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro

Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 25 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 25 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

26. ANSWER: The allegations set forth in Paragraph 26 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 26 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 26 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

27. ANSWER: The allegations set forth in Paragraph 27 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 27 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 27 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

28. ANSWER: The allegations set forth in Paragraph 28 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 28 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 28 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

V. CONSPIRACY, AIDING AND ABETTING, AND CONCERTED ACTION.

29. ANSWER: The allegations set forth in Paragraph 29 of the Complaint constitute statements

and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 29 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 29 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

30. ANSWER: Pro Se Defendant Karjian denies the allegations against him set forth in Paragraph 30 of the Complaint and lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 30 of the Complaint.

31. ANSWER: Pro Se Defendant Karjian denies the allegations against him set forth in Paragraph 31 of the Complaint and lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 31 of the Complaint.

32. ANSWER: The allegations set forth in Paragraph 32 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 32 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 32 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

33. ANSWER: The allegations set forth in Paragraph 33 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 33 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 33 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

34. ANSWER: The allegations set forth in Paragraph 34 of the Complaint constitute statements

and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 34 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 34 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

35. ANSWER: The allegations set forth in Paragraph 35 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 35 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 35 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

VI. FACTUAL ALLEGATIONS.

36. ANSWER: To the extent the allegations set forth in Paragraph 36 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents.

37. ANSWER: To the extent the allegations set forth in Paragraph 37 of the Complaint seek to paraphrase or characterize the contents of a written document, the document speaks for itself and Pro Se Defendant Karjian denies the allegations to the extent that they are inconsistent with the document.

38. ANSWER: Pro Se Defendant Karjian, based upon information and belief, admits the allegations set forth in Paragraph 38 of the Complaint.

39. ANSWER: To the extent the allegations set forth in Paragraph 39 of the Complaint seek to paraphrase or characterize the contents of a written document, the document speaks for itself

and Pro Se Defendant Karjian denies the allegations to the extent that they are inconsistent with the document.

40. ANSWER: To the extent the allegations set forth in Paragraph 40 of the Complaint seek to paraphrase or characterize the contents of a written document, the document speaks for itself and Pro Se Defendant Karjian denies the allegations to the extent that they are inconsistent with the document. Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 40 of the Complaint.

41. ANSWER: Pro Se Defendant Karjian, based upon information and belief, admits the allegations set forth in Paragraph 41 of the Complaint.

42. ANSWER: To the extent the allegations set forth in Paragraph 42 of the Complaint seek to paraphrase or characterize the contents of a written document, the document speaks for itself and Pro Se Defendant Karjian denies the allegations to the extent that they are inconsistent with the document. Upon information and belief, Pro Se Defendant Karjian admits that Morley has at all Relevant Times been a member of the Management Committee. Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 42 of the Complaint.

43. ANSWER: Pro Se Defendant Karjian, upon information and belief, admits the allegations set forth in Paragraph 43 of the Complaint.

44. ANSWER: The allegations set forth in Paragraph 44 of the Complaint are not made against Pro Se Defendant Karjian and no response is required. To the extent a response is required, Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 44 of the Complaint.

45. ANSWER: The allegations set forth in Paragraph 45 of the Complaint are not made against Pro Se Defendant Karjian and no response is required. To the extent a response is required and, to

the extent the allegations set forth in Paragraph 45 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian (i) denies the allegations to the extent that they are inconsistent with the documents and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 45 of the Complaint.

46. ANSWER: The allegations set forth in Paragraph 46 of the Complaint are not made against Pro Se Defendant Karjian and no response is required. To the extent a response is required, Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 46 of the Complaint.

47. ANSWER: The allegations set forth in Paragraph 47 of the Complaint are not made against Pro Se Defendant Karjian and no response is required. To the extent a response is required and, to the extent the allegations set forth in Paragraph 47 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian (i) denies the allegations to the extent that they are inconsistent with the documents and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 47 of the Complaint.

48. ANSWER: The allegations set forth in Paragraph 48 of the Complaint are not made against Pro Se Defendant Karjian and no response is required. To the extent a response is required, Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 48 of the Complaint.

49. ANSWER: The allegations set forth in Paragraph 49 of the Complaint are not made against Pro Se Defendant Karjian and no response is required. To the extent a response is required, Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 49 of the Complaint.

50. ANSWER: The allegations set forth in Paragraph 50 of the Complaint are not made against Pro Se Defendant Karjian and no response is required. To the extent a response is required, Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 50 of the Complaint.

51. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 51 of the Complaint.

52. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 52 of the Complaint. To the extent the allegations set forth in Paragraph 52 of the Complaint seek to paraphrase or characterize the contents of a written document, the document speaks for itself and Pro Se Defendant Karjian denies the allegations to the extent that they are inconsistent with the document.

53. ANSWER: To the extent the allegations set forth in Paragraph 53 of the Complaint seek to paraphrase or characterize the contents of a written document, the document speaks for itself and Pro Se Defendant Karjian denies the allegations to the extent that they are inconsistent with the document.

54. ANSWER: To the extent the allegations set forth in Paragraph 53 of the Complaint seek to paraphrase or characterize the contents of a written document, the document speaks for itself and Pro Se Defendant Karjian denies the allegations to the extent that they are inconsistent with the document.

55. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 55 of the Complaint.

56. ANSWER: To the extent the allegations set forth in Paragraph 56 of the Complaint seek to paraphrase or characterize the contents of a written document, the document speaks for itself and Pro Se Defendant Karjian denies the allegations to the extent that they are inconsistent with the

document.

57. ANSWER: To the extent the allegations set forth in Paragraph 56 of the Complaint seek to paraphrase or characterize the contents of a written document, the document speaks for itself and Pro Se Defendant Karjian denies the allegations to the extent that they are inconsistent with the document.

58. ANSWER: The allegations set forth in Paragraph 58 of the Complaint are not made against Pro Se Defendant Karjian and no response is required. To the extent a response is required and, to the extent the allegations set forth in Paragraph 58 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian (i) denies the allegations to the extent that they are inconsistent with the documents and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 58 of the Complaint.

59. ANSWER: To the extent the allegations set forth in Paragraph 59 of the Complaint seek to paraphrase or characterize the contents of a written document, the document speaks for itself and Pro Se Defendant Karjian denies the allegations to the extent that they are inconsistent with the document.

60. ANSWER: The allegations set forth in Paragraph 60 of the Complaint are not made against Pro Se Defendant Karjian and no response is required. To the extent a response is required and, to the extent the allegations set forth in Paragraph 60 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian (i) denies the allegations to the extent that they are inconsistent with the documents and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 60 of the Complaint.

61. ANSWER: The allegations set forth in Paragraph 61 of the Complaint are not made against

Pro Se Defendant Karjian and no response is required. To the extent a response is required and, to the extent the allegations set forth in Paragraph 61 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian (i) denies the allegations to the extent that they are inconsistent with the documents and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 61 of the Complaint.

62. ANSWER: The allegations set forth in Paragraph 62 of the Complaint are not made against Pro Se Defendant Karjian and no response is required. To the extent a response is required and, to the extent the allegations set forth in Paragraph 62 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian (i) denies the allegations to the extent that they are inconsistent with the documents and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 62 of the Complaint.

63. ANSWER: The allegations set forth in Paragraph 63 of the Complaint are not made against Pro Se Defendant Karjian and no response is required. To the extent a response is required and, to the extent the allegations set forth in Paragraph 63 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian (i) denies the allegations to the extent that they are inconsistent with the documents and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 63 of the Complaint.

64. ANSWER: Pro Se Defendant Karjian denies the allegations set forth in Paragraph 64 of the Complaint.

65. ANSWER: Pro Se Defendant Karjian denies the allegations set forth in Paragraph 65 of the Complaint.

66. ANSWER: Pro Se Defendant Karjian denies the allegations set forth in Paragraph 66 of the Complaint.

67. ANSWER: Pro Se Defendant Karjian denies the allegation that Plaintiff's investment was made in reliance on false and misleading statements made by and with the knowledge and complicity of the Pro Se Defendant Karjian; Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegation that Plaintiff's investment was made in reliance on false and misleading statements made by and with the knowledge and complicity of the remaining Insider Defendants. Pro Se Defendant Karjian denies the remaining allegations set forth in Paragraph 67 of the Complaint.

68. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 68 of the Complaint.

69. ANSWER: The allegations set forth in Paragraph 69 of the Complaint are not made against Pro Se Defendant Karjian and no response is required. To the extent a response is required, Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 69 of the Complaint.

70. ANSWER: Pro Se Defendant Karjian denies the allegations set forth in Paragraph 70 of the Complaint.

71. ANSWER: Pro Se Defendant Karjian repeats and realleges as if fully set forth herein its responses to the allegations in Paragraphs 1 to 70 of the complaint.

72. ANSWER: Pro Se Defendant Karjian denies the allegations set forth in Paragraph 72 of the Complaint.

73. ANSWER: Pro Se Defendant Karjian denies the allegations set forth in Paragraph 73 of the Complaint.

74. ANSWER: The allegations set forth in Paragraph 74 of the Complaint are not made against

Pro Se Defendant Karjian and no response is required. To the extent a response is required, Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 74 of the Complaint.

75. ANSWER: The allegations set forth in Paragraph 75 of the Complaint are not made against Pro Se Defendant Karjian and no response is required. To the extent a response is required, Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 75 of the Complaint. To the extent the allegations set forth in Paragraph 75 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents.

76. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 76 of the Complaint.

77. ANSWER: Pro Se Defendant Karjian denies the allegations set forth in Paragraph 77 of the Complaint.

78. ANSWER: The allegations set forth in Paragraph 78 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 78 of the Complaint, and (ii) respectfully refers all questions of law to the Court.

79. ANSWER: The allegations set forth in Paragraph 79 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) upon information and belief denies the allegations set forth in Paragraph 79 of the Complaint and (ii) respectfully refers all questions of law to the Court.

80. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a

belief as to the truth or falsity of the allegations set forth in Paragraph 80 of the Complaint.

81. ANSWER: Upon information and belief, Pro Se Defendant denies the allegations set forth in Paragraph 81 of the Complaint.

82. ANSWER: The allegations set forth in Paragraph 82 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 82 of the Complaint and (ii) respectfully refers all questions of law to the Court.

83. ANSWER: Pro Se Defendant lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 83 of the Complaint.

84. ANSWER: The allegations set forth in Paragraph 84 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 84 of the Complaint and (ii) respectfully refers all questions of law to the Court.

85. ANSWER: The allegations set forth in Paragraph 85 of the Complaint are not made against Pro Se Defendant Karjian and no response is required. To the extent a response is required, Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 85 of the Complaint.

86. ANSWER: To the extent the allegations in Paragraph 86 of the Complaint are made against Pro Se Defendant Karjian, Pro Se Defendant Karjian denies such allegations. Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 86 of the Complaint against the remaining Insider Defendants. To the extent the allegations set forth in Paragraph 86 of the Complaint seek to paraphrase or characterize

the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents.

87. ANSWER: To the extent the allegations set forth in Paragraph 87 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents.

88. ANSWER: Pro Se Defendant Karjian admits that MB Global Partners LLC is a Delaware limited liability company that was formed on December 27, 2011. Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 88 of the Complaint.

89. ANSWER: Pro Se Defendant Karjian admits that MB Global Advisers LLC is a Delaware limited liability company that was formed on December 27, 2011. Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 89 of the Complaint.

90. ANSWER: To the extent the allegations set forth in Paragraph 90 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents.

91. ANSWER: To the extent the allegations set forth in Paragraph 91 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents.

92. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a

belief as to the truth or falsity of the allegations in Paragraph 92 of the Complaint.

93. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 93 of the Complaint.

94. ANSWER: To the extent the allegations set forth in Paragraph 94 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents.

95. ANSWER: Pro Se Defendant Karjian denies that he is an employee of MB Global Partners and lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations in Paragraph 95 of the Complaint.

96. ANSWER: To the extent the allegations set forth in Paragraph 96 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents or the allegations set forth in Paragraph 96 of the Complaint.

97. ANSWER: To the extent the allegations in Paragraph 97 of the Complaint are made against Pro Se Defendant Karjian, Pro Se Defendant Karjian denies such allegations. Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 97 of the Complaint against the remaining Defendants. To the extent the allegations set forth in Paragraph 97 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents.

98. ANSWER: To the extent the allegations in Paragraph 98 of the Complaint are made against Pro Se Defendant Karjian, Pro Se Defendant Karjian denies such allegations. Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the

allegations in Paragraph 98 of the Complaint against the remaining Defendants. To the extent the allegations set forth in Paragraph 98 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents.

99. ANSWER: To the extent the allegations in Paragraph 99 of the Complaint are made against Pro Se Defendant Karjian, Pro Se Defendant Karjian denies such allegations. Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 99 of the Complaint against the remaining Defendants. To the extent the allegations set forth in Paragraph 99 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents.

100. ANSWER: Pro Se Defendant Karjian denies the allegations set forth in Paragraph 100 of the Complaint.

101. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 101 of the Complaint.

102. ANSWER: To the extent the allegations set forth in Paragraph 102 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents.

103. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 103 of the Complaint.

104. ANSWER: Pro Se Defendant Karjian denies the allegations against him set forth in Paragraph 104 of the Complaint and lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 104 of the Complaint.

105. ANSWER: The allegations set forth in Paragraph 105 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 105 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 105 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

106. ANSWER: The allegations set forth in Paragraph 106 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 106 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 106 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

107. ANSWER: The allegations set forth in Paragraph 107 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 107 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 107 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

108. ANSWER: The allegations set forth in Paragraph 108 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 108 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 108 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

109. ANSWER: Pro Se Defendant Karjian repeats and realleges as if fully set forth herein its responses to the allegations in Paragraphs 1 to 108 of the complaint.

110. ANSWER: To the extent the allegations set forth in Paragraph 110 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents.

111. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 111 of the Complaint.

112. ANSWER: To the extent the allegations set forth in Paragraph 112 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents.

113. ANSWER: To the extent the allegations set forth in Paragraph 113 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents.

114. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 114 of the Complaint.

115. ANSWER: To the extent the allegations set forth in Paragraph 115 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents.

116. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 116 of the Complaint.

117. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 117 of the Complaint.

118. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 118 of the Complaint.

119. ANSWER: To the extent the allegations set forth in Paragraph 119 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents.

120. ANSWER: Pro Se Defendant Karjian denies the allegations set forth in Paragraph 120 of the Complaint.

121. ANSWER: Pro Se Defendant Karjian denies the allegations set forth in Paragraph 121 of the Complaint.

122. ANSWER: To the extent the allegations set forth in Paragraph 122 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents or the allegations set forth in Paragraph 122 of the Complaint.

123. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 123 of the Complaint.

124. ANSWER: Pro Se Defendant Karjian denies the allegations set forth in Paragraph 124 of the Complaint.

125. ANSWER: Pro Se Defendant Karjian admits the allegations set forth in Paragraph 125 of the Complaint.

126. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 126 of the Complaint.

127. ANSWER: Pro Se Defendant Karjian denies the allegations set forth in Paragraph 127 of the Complaint.

128. ANSWER: To the extent the allegations set forth in Paragraph 128 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents or the allegations set forth in Paragraph 96 of the Complaint.

129. ANSWER: To the extent the allegations set forth in Paragraph 129 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents or the allegations set forth in Paragraph 96 of the Complaint.

130. ANSWER: To the extent the allegations set forth in Paragraph 130 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents or the allegations set forth in Paragraph 130 of the Complaint.

131. ANSWER: To the extent the allegations set forth in Paragraph 131 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents or the allegations set forth in Paragraph 131 of the Complaint.

132. ANSWER: To the extent the allegations set forth in Paragraph 132 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents or the allegations set forth in Paragraph 132 of the Complaint.

133. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 133 of the Complaint.

134. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 134 of the Complaint.

135. ANSWER: To the extent the allegations set forth in Paragraph 135 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents or the allegations set forth in Paragraph 135 of the Complaint.

136. ANSWER: To the extent the allegations set forth in Paragraph 136 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents or the allegations set forth in Paragraph 136 of the Complaint.

137. ANSWER: To the extent the allegations set forth in Paragraph 137 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents or the allegations set forth in Paragraph 137 of the Complaint.

138. ANSWER: To the extent the allegations set forth in Paragraph 138 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents or the allegations set forth in Paragraph 138 of the Complaint.

139. ANSWER: To the extent the allegations set forth in Paragraph 139 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of such documents or the allegations set forth in Paragraph 139 of the Complaint.

140. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 140 of the Complaint.

141. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 141 of the Complaint.

142. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 142 of the Complaint.

143. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 143 of the Complaint.

144. ANSWER: To the extent the allegations in Paragraph 144 of the Complaint are made against Pro Se Defendant Karjian, Pro Se Defendant Karjian denies such allegations. Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 144 of the Complaint against the remaining Insider Defendants.

145. ANSWER: The allegations set forth in Paragraph 145 of the Complaint are not made against Pro Se Defendant Karjian and no response is required. To the extent a response is required and, to the extent the allegations set forth in Paragraph 145 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian (i) denies the allegations to the extent that they are inconsistent with the documents and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 145 of the Complaint.

146. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 146 of the Complaint.

147. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 147 of the Complaint.

148. ANSWER: The allegations set forth in Paragraph 148 of the Complaint are not made against Pro Se Defendant Karjian and no response is required. To the extent a response is required and, to the extent the allegations set forth in Paragraph 148 of the Complaint seek to paraphrase or

characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 148 of the Complaint.

149. ANSWER: To the extent the allegations set forth in Paragraph 149 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian denies the allegations to the extent that they are inconsistent with the documents.

150. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 150 of the Complaint.

151. ANSWER: To the extent the allegations set forth in Paragraph 151 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian (i) denies the allegations to the extent that they are inconsistent with the documents and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 151 of the Complaint.

152. ANSWER: Pro Se Defendant Karjian denies the allegation that Morley is the Chairman of Y2X, Inc. Pro Se Defendant Karjian denies the remaining allegations in Paragraph 152 of the Complaint.

153. ANSWER: To the extent the allegations set forth in Paragraph 153 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian (i) denies the allegations to the extent that they are inconsistent with the documents and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 153 of the Complaint.

154. ANSWER: Pro Se Defendant Karjian, denies the allegations set forth in Paragraph 154 of the Complaint.

155. ANSWER: To the extent the allegations set forth in Paragraph 155 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves.

156. ANSWER: To the extent the allegations set forth in Paragraph 156 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for.

157. ANSWER: To the extent the allegations set forth in Paragraph 151 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves.

158. ANSWER: Pro Se Defendant Karjian denies the allegations set forth in Paragraph 158 of the Complaint.

159. ANSWER: To the extent the allegations set forth in Paragraph 159 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian (i) denies the allegations to the extent that they are inconsistent with the documents and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 159 of the Complaint.

160. ANSWER: To the extent the allegations set forth in Paragraph 160 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian (i) denies the allegations to the extent that they are inconsistent with the documents and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 160 of the Complaint.

161. ANSWER: To the extent the allegations set forth in Paragraph 161 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian (i) denies the allegations to the extent that they are inconsistent with the documents and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 161 of the Complaint.

162. ANSWER: Pro Se Defendant Karjian denies the allegations in Paragraph 162 of the

Complaint.

163. ANSWER: To the extent the allegations set forth in Paragraph 163 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves.

164. ANSWER: To the extent the allegations set forth in Paragraph 163 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves.

165. ANSWER: To the extent the allegations set forth in Paragraph 165 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian (i) denies the allegations to the extent that they are inconsistent with the documents and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 165 of the Complaint.

166. ANSWER: To the extent the allegations set forth in Paragraph 166 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves and Pro Se Defendant Karjian (i) denies the allegations to the extent that they are inconsistent with the documents and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 166 of the Complaint.

167. ANSWER: To the extent the allegations set forth in Paragraph 167 of the Complaint seek to paraphrase or characterize the contents of written documents, the documents speak for themselves.

168. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 168 of the Complaint.

169. ANSWER: The allegations set forth in Paragraph 169 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 169 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 169 of the Complaint, and (iii) respectfully refers all

questions of law to the Court.

170. ANSWER: Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 170 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 170 of the Complaint.

171. ANSWER: Pro Se Defendant Karjian denies the allegations set forth in Paragraph 171 of the Complaint.

172. ANSWER: Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 172 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 172 of the Complaint.

VII. PLAINTIFF'S DAMAGES AND LOSS CAUSATION.

173. ANSWER: Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 173 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 173 of the Complaint.

174. ANSWER: The allegations set forth in Paragraph 174 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) denies the allegations set forth in Paragraph 174 of the Complaint and (ii) respectfully refers all questions of law to the Court.

175. ANSWER: The allegations set forth in Paragraph 175 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 175 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 175 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

176. ANSWER: Pro Se Defendant Karjian (i) denies the allegations against him set forth in

Paragraph 176 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 176 of the Complaint.

VIII. DERIVATIVE AND DEMAND FUTILITY ALLEGATIONS.

177. ANSWER: Pro Se Defendant Karjian repeats and realleges as if fully set forth herein its responses to the allegations in Paragraphs 1 to 176 of the Complaint.

178. ANSWER: Pro Se Defendant Karjian repeats and realleges as if fully set forth herein its responses to the allegations in Paragraphs 1 to 177 of the Complaint.

179. ANSWER: Pro Se Defendant Karjian repeats and realleges as if fully set forth herein its responses to the allegations in Paragraphs 1 to 178 of the Complaint.

180. ANSWER: Pro Se Defendant Karjian repeats and realleges as if fully set forth herein its responses to the allegations in Paragraphs 1 to 179 of the Complaint.

181. ANSWER: Pro Se Defendant Karjian repeats and realleges as if fully set forth herein its responses to the allegations in Paragraphs 1 to 180 of the Complaint.

182. ANSWER: Pro Se Defendant Karjian repeats and realleges as if fully set forth herein its responses to the allegations in Paragraphs 1 to 181 of the Complaint.

183. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 183 of the Complaint.

184. ANSWER: The allegations set forth in Paragraph 184 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 184 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

185. ANSWER: The allegations set forth in Paragraph 185 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro

Se Defendant Karjian (i) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 185 of the Complaint and (ii) respectfully refers all questions of law to the Court.

186. ANSWER: The allegations set forth in Paragraph 186 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 186 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 186 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

187. ANSWER: Pro Se Defendant Karjian denies the allegation that he controls the board of G2 GMV (sic) and G2 IG and makes all major decisions on behalf of those entities. Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegation that de la Rua and Sams control the board of G2 GMV (sic) and G2 IG and make all major decisions on behalf of those entities. Upon information and belief, Pro Se Defendant Karjian admits that Morley controls the board of G2 GMV (sic) and G2 IG and makes all major decisions on behalf of those entities.

IX. CLAIMS.

188. ANSWER: Pro Se Defendant Karjian repeats and realleges as if fully set forth herein its responses to the allegations in Paragraphs 1 to 187 of the complaint.

189. ANSWER: Pro Se Defendant Karjian denies the allegations set forth in Paragraph 189 of the Complaint.

190. ANSWER: Pro Se Defendant Karjian denies the allegations set forth in Paragraph 190 of the Complaint.

191. ANSWER: Pro Se Defendant Karjian denies the allegations set forth in Paragraph 191 of the

Complaint.

192. ANSWER: Pro Se Defendant Karjian denies the allegations set forth in Paragraph 192 of the Complaint.

193. ANSWER: Pro Se Defendant Karjian denies the allegations set forth in Paragraph 193 of the Complaint.

194. ANSWER: Pro Se Defendant Karjian denies the allegations set forth in Paragraph 194 of the Complaint.

195. ANSWER: Pro Se Defendant Karjian denies the allegations set forth in Paragraph 195 of the Complaint.

196. ANSWER: Pro Se Defendant Karjian denies the allegations set forth in Paragraph 196 of the Complaint.

197. ANSWER: Pro Se Defendant Karjian repeats and realleges as if fully set forth herein its responses to the allegations in Paragraphs 1 to 196 of the complaint.

198. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 198 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 198 of the Complaint.

199. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 199 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 199 of the Complaint.

200. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 200 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 200 of the Complaint.

201. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 201 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief

as to the truth or falsity of the remaining allegations set forth in Paragraph 201 of the Complaint.

202. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 202 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 202 of the Complaint.

203. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 203 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 203 of the Complaint.

204. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 204 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 204 of the Complaint.

205. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 205 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 205 of the Complaint.

206. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 206 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 206 of the Complaint.

207. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 207 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 207 of the Complaint.

208. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 208 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 208 of the Complaint.

209. ANSWER: Pro Se Defendant Karjian repeats and realleges as if fully set forth herein its responses to the allegations in Paragraphs 1 to 209 of the complaint.

210. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 210 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 210 of the Complaint.

211. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 211 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 211 of the Complaint.

212. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 212 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 212 of the Complaint.

213. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 213 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 213 of the Complaint.

214. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 214 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 214 of the Complaint.

215. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 215 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 215 of the Complaint.

216. ANSWER: Pro Se Defendant Karjian repeats and realleges as if fully set forth herein its responses to the allegations in Paragraphs 1 to 215 of the Complaint.

217. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 217 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 217 of the Complaint.

218. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in

Paragraph 218 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 218 of the Complaint.

219. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 219 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 219 of the Complaint.

220. ANSWER: The allegations set forth in Paragraph 220 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 220 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 220 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

221. ANSWER: The allegations set forth in Paragraph 221 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 221 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 221 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

222. ANSWER: The allegations set forth in Paragraph 222 of the Complaint constitute statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 222 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 222 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

223. ANSWER: Pro Se Defendant Karjian repeats and realleges as if fully set forth herein its

responses to the allegations in Paragraphs 1 to 222 of the Complaint.

224. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 224 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 224 of the Complaint.

225. ANSWER: Pro Se Defendant Karjian (i) repeats and realleges as if fully set forth herein its responses to the allegations in Paragraphs 1 to 224 of the complaint (ii) denies the allegations set forth against him in Paragraph 225 of the Complaint and (iii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 225 of the Complaint.

226. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 226 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 226 of the Complaint.

227. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 227 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 227 of the Complaint.

228. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 228 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 228 of the Complaint.

229. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 229 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 229 of the Complaint.

230. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 230 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 230 of the Complaint.

231. ANSWER: Pro Se Defendant Karjian repeats and realleges as if fully set forth herein its responses to the allegations in Paragraphs 1 to 230 of the complaint.

232. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 232 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 232 of the Complaint.

233. ANSWER: Pro Se Defendant Karjian lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 233 of the Complaint.

234. ANSWER: Pro Se Defendant Karjian (i) denies the allegations set forth against him in Paragraph 234 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 234 of the Complaint.

235. statements and conclusions of law to which no response is required. To the extent any response is required, Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 235 of the Complaint, (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 235 of the Complaint, and (iii) respectfully refers all questions of law to the Court.

236. ANSWER: Pro Se Defendant Karjian repeats and realleges as if fully set forth herein its responses to the allegations in Paragraphs 1 to 235 of the Complaint.

237. ANSWER: The allegations set forth in Paragraph 237 of the Complaint are not made against Pro Se Defendant Karjian and no response is required.

238. ANSWER: Pro Se Defendant Karjian repeats and realleges as if fully set forth herein its responses to the allegations in Paragraphs 1 to 237 of the Complaint.

239. ANSWER: The allegations set forth in Paragraph 239 of the Complaint are not made against Pro Se Defendant Karjian and no response is required.

240. ANSWER: The allegations set forth in Paragraph 240 of the Complaint are not made against

Pro Se Defendant Karjian and no response is required.

241. ANSWER: The allegations set forth in Paragraph 241 of the Complaint are not made against Pro Se Defendant Karjian and no response is required.

242. ANSWER: The allegations set forth in Paragraph 242 of the Complaint are not made against Pro Se Defendant Karjian and no response is required. To the extent a response is required, Pro Se Defendant Karjian denies the allegations set forth against him and relief demanded from him in Paragraph 242 of the Complaint.

243. ANSWER: The allegations set forth in Paragraph 243 of the Complaint are not made against Pro Se Defendant Karjian and no response is required.

244. ANSWER: The allegations set forth in Paragraph 244 of the Complaint are not made against Pro Se Defendant Karjian and no response is required.

245. ANSWER: Pro Se Defendant Karjian repeats and realleges as if fully set forth herein its responses to the allegations in Paragraphs 1 to 244 of the Complaint.

246. ANSWER: Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 246 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 246 of the Complaint.

247. ANSWER: Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 247 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 247 of the Complaint.

248. ANSWER: Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 248 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 248 of the Complaint.

249. ANSWER: Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 249 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 249 of the Complaint.

250. ANSWER: Pro Se Defendant Karjian (i) denies the allegations against him set forth in Paragraph 250 of the Complaint and (ii) lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations set forth in Paragraph 250 of the Complaint.

251. ANSWER: Pro Se Defendant Karjian repeats and realleges as if fully set forth herein its responses to the allegations in Paragraphs 1 to 250 of the Complaint.

252. ANSWER: Pro Se Defendant Karjian denies the allegations set forth in Paragraph 252 of the Complaint.

253. ANSWER: Pro Se Defendant Karjian denies the allegations set forth in Paragraph 253 of the Complaint.

254. ANSWER: Pro Se Defendant Karjian denies the allegations set forth in Paragraph 254 of the Complaint.

X. REQUEST FOR RELIEF.

ANSWER: To the extent Plaintiffs seek relief against Pro Se Defendant Karjian, Pro Se Defendant Karjian denies that Plaintiffs are entitled to any such relief on the basis that the allegations against Pro Se Defendant Karjian contained in the Complaint are untrue. To the extent Plaintiffs seek relief against the other Defendants, no response is required by Pro Se Defendant Karjian.

XI. AFFIRMATIVE DEFENSES.

As affirmative defenses, Pro Se Defendant Karjian alleges and states as follows:

1. Plaintiffs have failed in whole or in part to state a claim against Pro Se Defendant Karjian upon which relief can be granted.
2. Plaintiffs have suffered no damages by Pro Se Defendant Karjian and/or have failed to mitigate their damages, if any.
3. Plaintiffs have suffered no injury by Pro Se Defendant Karjian nor is there a likelihood of injury by Pro Se Defendant Karjian.
4. Plaintiffs have suffered no harm and/or irreparable harm by Pro Se Defendant Karjian.
5. Plaintiffs failed to protect and/or enforce their alleged rights.
6. Plaintiffs' Complaint is barred as unconscionable.
7. Plaintiffs' Complaint is barred by reason of waiver, estoppel, laches and Plaintiffs' unclean hands.
8. Plaintiffs' Complaint is barred by the Statutes of Limitations.
9. Pro Se Defendant Karjian cannot be held liable for the unilateral acts or omissions of the remaining Defendants.
10. Plaintiffs' Complaint is barred by other applicable affirmative defenses afforded Pro Se Defendant Karjian.

XII. PRO SE DEFENDANT KARJIAN'S PRAYER FOR RELIEF.

Having completely and fully provided his Answer to the Complaint, Pro Se Defendant Karjian therefore also denies Plaintiffs' Request for Relief.

WHEREFORE, Pro Se Defendant Karjian prays for relief as follows:

1. The Complaint against Pro Se Defendant Karjian be dismissed with prejudice.
2. Pro Se Defendant Karjian be awarded such other further relief as the Court deems just and equitable.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 30th day of August, 2021.

Respectfully submitted,

By: /s/ Dori Karjian, Pro Se Defendant

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